

**TRANSDUCERS FOR FERROELECTRIC STORAGE MEDIUM**

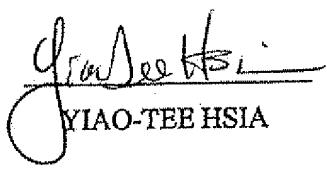
**STATEMENT OF FACTS BY EARL C. JOHNS, YIAO-TEE HSIA AND JAMES D. KIELY**

We, Earl C. Johns, Yiao-Tee Hsia and James D. Kiely, state as follows:

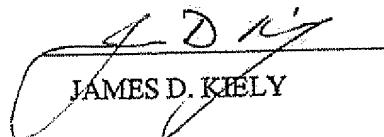
1. We are employees of Seagate Technology LLC (the assignee in the above-identified application) and inventors in the above-identified application.
2. Based on our education, training and experience (see attached Exhibit A for a curriculum vitae of each inventor), we submit that, to those skilled in the art of data storage, shields used in ferroelectric transducers are electric shields and that the differences between electric shields and magnetic shields are highly distinctive. Some primary differences between electric and magnetic shields are included below.
  - Electric shields and magnetic shields are formed of different materials.
  - The properties of magnetic shields, which are made of magnetic materials, are influenced by the limitation of magnetic moment, not surpassing 2.4 Tesla. In the electric properties of metals, which electric shields are made of, there is no such limitation.
  - An electric shield can be set to a particular electric potential with respect to a storage medium by using a suitable electric circuit. With magnetic shields, although this is theoretically possible, it cannot be easily carried out.
  - When electric shields are connected to a circuit, they are structurally different than magnetic shields. They are a circuit component rather than a passive metal layer.



EARL C. JOHNS



YIAO-TEE HSIA



JAMES D. KIELY